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WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE, LOUISIANA

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA

MARVIN M. WILLIAMSON JR.

CIVIL ACTION

VS.

**6:08-CV-0441 LAF**

THE MORGAN CITY POLICE DEPARTMENT  
AND THE CITY OF MORGAN CITY

PETITION FOR DAMAGES

The petition of Marvin M. Williamson Jr., a resident of the Parish of St. Mary,  
State of Louisiana, respectfully shows that:

I.

Jurisdiction in under 42 USC ss 1983

II.

Defendant's herein are, the Morgan City Police Department and the City of  
Morgan City, a public municipal corporation and Police Officers Darlene Francis and  
Jimmy Richard, in their capacity as police officers acting in their official capacity under  
color of law, have violated the civil rights of the plaintiff.

III.

On or about January 15, 2008 between 5 and 6 o'clock P.M. , Marvin Williamson  
was arrested in the Star Bar on Railroad Avenue in Morgan City by members of the  
Morgan City Police Department Sgt. Mark Griffin Sr. And Officer Jimmy Richard  
without incident.

IV.

While in the booking room of the Morgan City Police Department Plaintiff Marvin Williamson, Jr. was attacked and beaten by a Morgan City Police Officer as depicted in the video disk of this arrest.

V.

The aforementioned beating was an illegal use of excessive force by a police officers under color of law while in the employ of the City of Morgan City . This beating occurred in the booking room of the Morgan City Police Department's facility in Morgan City, Louisiana.

VI.

Plaintiff alleges that after being severely beaten he was denied medical treatment for his injuries until January 17, 2008 at 15:53 when he was brought to the emergency room by a member of the Morgan City Police Department.

VII.

Plaintiff alleges that he was punched in the face and lower back by a police officer sustaining injuries to his lower back and left eye, facial fracture and neck.

VIII.

The failure to provide medical care for the injuries sustained in his booking for almost two days constitutes cruel and unusual punishment.

IX.

The malicious intent of the defendant's is demonstrated by their failure to report

this incident to supervisory personnel and failure of the jail supervisor, Darlene Francis, to properly train and supervise personnel under her charge.

X.

Petitioner, Marvin Williamson, Jr., is entitled to damages for past, present and future pain and suffering together with reasonable medical expenses. Plaintiff is further entitled to damages for the actions of the Morgan City Police Department, who violated his civil rights during his arrest and incarceration.

WHEREFORE, petitioner prays that after due proceedings there be judgment herein in favor of petitioner, Marvin M. Williamson, Jr., and against defendant's, the Morgan City Police Department and the City of Morgan City, in such sums as the court finds appropriate, with legal interest thereon from date of judicial demand, and for all costs of this proceeding.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'C.E. Bourg, II', is written over a horizontal line.

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